

From: [Stephen Tzhone](#)
To: [Jon Rauscher](#); [John Meyer](#)
Cc: [Carlos Sanchez](#); [Donald Williams](#); [Gloria-Small Moran/R6/USEPA/US@EPA](#); [Casey Lockett](#)
Subject: Re: Arkwood Site
Date: 05/14/2012 05:30 PM
Attachments: [Partial Delisting2_criteria.docx](#)

Hi Jon, John,

I'm researching the technical foundation for two issues (i.e.: ready for reuse and partial delisting) that have been controversial between the community and PRPs.

In my research, I reviewed a draft update (below) which states:

Chemical	PRG (10-6 or HQ = 1)	10-4 Level for Cancer PRG	Basis
PCP	2.7 mg/kg	270 mg/kg	Cancer
B(a)P	0.21 mg/kg	21 mg/kg	Cancer
2,3,7,8-TCDD	0.6 µg/kg	--	Non-cancer

'It seems under the latest industrial standards (PRGs) the soils remedy part can be deleted per the Risk Assessors...' and '...the entire site is covered with 6 inches of clean soil'.

Question 1: Does this table reflect the most current EPA industrial risk goals for soil?

Question 2: The 1990 ROD cleanup levels were: PCP 300 mg/kg, B(a)P 6.0 mg/kg, and 2,3,7,8-TCDD 20 µg/kg. When comparing these levels to the table, only B(a)P is within the risk range... was there a rationale for the others to be considered acceptable?

Question 3: How are soil exposure pathways eliminated in an industrial risk scenario, i.e. would 6 inches of clean topsoil suffice?

Thanks,

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▼ [Shawn Ghose---05/14/2012 01:20:13 PM---The message is ready to be sent with the following file or link attachments: Partial Delisting2_cr](#)

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